

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA

SAVANNAH DIVISION

U. S. DISTRICT COURT  
Southern District of Ga.

Filed in Office

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TRB  
Deputy Clerk

JANET K. HIGGINS )

Plaintiff )

vs. )

CIVIL ACTION NO.:

4:17-CV-00257-WTM-GRS

THE CITY OF SAVANNAH, GEORGIA, )

et. al., )

Defendants )

PLAINTIFF'S REQUEST TO SUPPLEMENT

PLAINTIFF'S MOTION FOR SANCTIONS

NOW COMES Janet K. Higgins, Plaintiff Pro Se, alleging Misconduct, in violation of Federal Rules of Civil Procedure 11(b) and in accordance with Federal Rules of Civil Procedure 11(c)(2) on the part of Shalena Cook Jones, Bar No. 526846, attorney for the Defendants in the original case Civil Action File No. SPCV17-01109-MO in the Superior Court of Chatham County State of Georgia Removed as Civil Action No. 4:17-CV-00257-WTM-GRS to the United States District Court Southern District of Georgia Savannah Division. Plaintiff alleges misconduct and violation of Fed. R. Civ. P. 11(b) and wishes to add the following to Plaintiff's original Motion For Sanctions:

In addition to the 10 points listed in Plaintiff's original Motion, Plaintiff wishes the court to consider that Shalena Cook Jones' tampering with the administration of justice, in the indisputable manner which Plaintiff has alleged and has provided documentary evidence to support those allegations, involves far more than just injury to this Plaintiff. It is a wrong against the institutions set up to protect and safeguard the public; institutions in which fraud cannot complacently be tolerated consistently with the good order of society. The public welfare demands that the agencies of public justice be not so impotent that they must always be mute and helpless victims of deception and fraud.

When Defendants' attorney has engaged in the alleged actions of filing fraudulent documents, for the benefit of the Defendants and to the harm and inconvenience of the Plaintiff, and, even when by Declaration under Penalty of Perjury, Shalena Cook Jones declared such to be true and correct, when in fact the information was false, by providing said false information to the Court, Shalena Cook Jones demonstrates Bad Faith litigation and a disregard for the mechanism for protecting the integrity of the judicial process.

Shalena Cook Jones, when filing in an ongoing judicial proceeding, filed fraudulent documents specifically directed at affecting those proceedings, has committed "Fraud on the Court". As such, this Court may exercise its inherent authority and sanction "Fraud on the Court" through Default. Plaintiff asserts that this Court has received clear and convincing evidence to support Plaintiff's allegations. Plaintiff asks this court, in view of the seriousness of the affront, by Shalena Cook Jones, to the judicial system, to impose the sanction of Default. More appropriately, Defendants' violated Rule 37 of the Federal Rules of Civil Procedure by deceitfully filing "Notice of Notice of filing Removal Notification" with the District Court and not with the Superior Court, thus effectuating the premature Removal and commencing Discovery by fraudulent means.

As previously stated, Defendants also violated Rule 11 of the Federal Rules of Civil Procedure when the falsification manifests itself in false pleadings, when Shalena Cook Jones continued the deceit by displaying a disregard for alternative sanctions by the Court for those misdeeds.

As previously asserted, Plaintiff additionally claims that Defendants have not ever filed proper "Answers" to Plaintiff's complaint within 30 days and did not ever file for a defense to that automatic default, with the Superior Court or to this Court.

Therefore, Plaintiff feels that she has provided the necessary evidence to this court for this Court to impose the Sanction of Default, as requested by this Plaintiff.

Respectfully submitted this 22<sup>nd</sup> day of February, 2018,



Janet K. Higgins  
Plaintiff Pro Se

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day filed the foregoing pleading, Plaintiff's Request to Supplement Plaintiff's Motion to Sanction, with the Clerk of Court and upon Shalena Cook Jones, Attorney for the Defendants in this case via Certified USPS Return Receipt Requested, proper postage affixed and addressed as follows:

The Law Office of  
Shalena Cook Jones  
1909 Abercorn St.  
Savannah, Georgia 31401



Janet K. Higgins  
Plaintiff Pro Se  
55 N Fresno Ave.  
Hernando, Fl. 34442  
352-270-2712 352-270-1475  
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